

Eyck O. Lugo Rivera

From: Tessie Leal Garabis <tleal@mellado.com>
Sent: Wednesday, March 27, 2024 5:07 PM
To: Eyck O. Lugo Rivera; Jairo Mellado
Cc: Adriana Vega Hernández; Anna Caban
Subject: RE: Global Sales Group, Corp. v. Senci Power USA, Inc. d/b/a A-iPower Corp., Case No. 23-1213 (SCC), U.S. District Court for the District of Puerto Rico

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Dear Counsel:

We are currently evaluating your email of March 19th together with the additional production of documents. However, we wanted to let you know that after discussing the subject of depositions with our client he informed us that we can coordinate the depositions of the following persons in California:

1. Irma Paz
2. Dorance Noonan
3. Scott Meisenheimer

Please advise as to the dates in which you intend to take these depositions. We can make available the offices of Alexei Brenot, Esq., at NOSSAMAN LLP, 777 South Figueroa Street, 34th Floor, Los Angeles, CA 90017, if you need a place to taken them. Regarding Ashfaq Mohammed he is no longer an employee of AIP, therefore you will need to subpoena him. His last known address is 1535 Rancho Hills Dr. Chino Hills, CA 91709.

Also, we hereby inform you that for now we will take the depositions of Tulio Figueroa, Emily Figueroa and Christopher Giallanza. We are planning to depose Emily and Tulio Figueroa on two of the following dates: Abril 23-25. Please select 2 of those date so that we can send you the corresponding notices. The depositions will be taken in person in our offices. Also, we plan to take the deposition of Christopher Giallanza on April 30th through video conference. Please let us know if that date is available to you so that we can send him the corresponding subpoena. Any additional depositions will be informed as soon as we finish reviewing the documents produced on March 19th, 2024.

With nothing further,

Tessie

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